

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 1:19cr59
	)	
DANIEL EVERETTE HALE	)	

CONSENT MOTION TO UNSEAL ORDERS

On November 27, 2019, this Court issued an order resolving several outstanding motions. Dkt. 97. On December 3, 2019, this Court issued another order resolving an additional outstanding motion. Dkt. 98. Both orders were issued under seal. Upon review of the text of the orders, the United States is aware of no reason why the orders need remain under seal. Accordingly, the United States moves to unseal them.

Sealing should be narrowly tailored to balance the values furthered by sealing (including the protection of ongoing criminal investigations) against the values furthered by unsealing (including the enhancement of the public's ability to evaluate the performance of the investigators). *Baltimore Sun v. Goetz*, 886 F.2d 60, 65-66 (4<sup>th</sup> Cir. 1989). There is no compelling government interest in maintaining under seal the orders issued by this Court on November 27 and December 3, 2019, and unsealing the orders would not reveal information that must be protected against disclosure. As a result, the United States now moves for the unsealing of this Court's Orders, Docket items 97 and 98.

Counsel for the defendant have authorized us to represent that they do not oppose this motion.

Respectfully submitted,

G. Zachary Terwilliger  
United States Attorney

By: \_\_\_\_\_/s\_\_\_\_\_  
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CERTIFICATE OF SERVICE

This is to certify that on December 11, 2019, I electronically filed the foregoing  
CONSENT MOTION TO UNSEAL ORDERS with the Clerk of Court using the CM/ECF  
system, which will send a notification of such filing (NEF) to counsel of record.

\_\_\_\_\_/s/\_\_\_\_\_  
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ORDER TO UNSEAL

WHEREAS, on November 27, 2019, this Court issued an order resolving several outstanding motions (Dkt. 97);

WHEREAS, on December 3, 2019, this Court issued another order resolving an additional outstanding motion (Dkt. 98);

WHEREAS, the United States has now moved to unseal those documents on the grounds and the defendant does not oppose that motion;

WHEREAS, there is no longer any compelling government interest in keeping the orders under seal;

NOW, THEREFORE, IT IS ORDERED, ADJUDGED, and DECREED that the Orders issued by this Court in this case on November 27, 2019 (Dkt. 97) and December 3, 2019 (DKt. 98) be and hereby are unsealed.

Date: \_\_\_\_\_

\_\_\_\_\_